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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

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11 AMERICAN PRESIDENT LINES, LTD., and
APL CO, Pte., LTD,

12 Plaintiff,
13 v.

14 HARTFORD FIRE INSURANCE COMPANY, a
corporation,

15 Defendant.

16 AND RELATED CROSS-COM, PLAINT

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No. C05 4717 MMC

STIPULATED REQUEST FOR ORDER
GRANTING RELIEF FROM CASE
MANAGEMENT SCHEDULE ;
ORDER THEREON

18 Pursuant to Local Rules 6-1(b), 6-2(a), and 16-2(d) and (e), Plaintiffs American President
19 Lines Ltd. and APL Co.Pte., LTD. (collectively “APL”) and defendant Hartford Fire Insurance
20 Company (“Hartford”) request relief from the Case Management Conference Schedule in the
21 above-captioned matter.

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24 Although the Case Management Conference had previously been continued shortly after
25 the case was originally served, APL and Hartford have not settled the case and require additional

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STIPULATED REQUEST FOR ORDER GRANTING RELIEF FROM CASE
MANAGEMENT SCHEDULE

1 time to finalize the settlement agreement and exchange the settlement funds. In addition,
2 Hartford requires additional time to enter the default judgment against cross-defendants, against
3 whom defaults have already been entered by this court. See Declaration of Sharon R. Biederman
4 submitted herewith.
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7 It is hereby stipulated between APL and Hartford that the Case Management Conference
8 now set for Friday, July 14, 2006, be continued approximately three months or to another time
9 chosen by the court to allow the finalization of the settlement and the entry of the judgment
10 against cross-defendants.
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12 It is also stipulated between APL and Hartford that all other court deadlines be vacated,
13 upon approval of the court, because the matter has been settled and a default judgment will be
14 entered against the cross-defendants.
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17 Dated: 7/11/06 LUCAS VALLEY LAW
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20 By: MKL
21 Mark K. de Langis
Attorneys for Plaintiffs, APL

22 Dated: JULY 10, 2006 BIEDERMAN & ASSOCIATES
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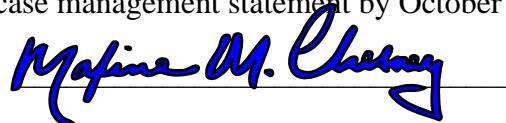
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25 By: Sharon R. Biederman
26 Sharon R. Biederman
Attorneys for Defendant, Hartford

STIPULATED REQUEST FOR ORDER GRANTING RELIEF FROM CASE
MANAGEMENT SCHEDULE

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2 PURSUANT TO STIPULATION, IT IS SO ORDERED. The July 14, 2006
3 case management conference is hereby CONTINUED to October 13, 2006 at 10:30 a.m. Unless a
dismissal has been filed, the parties shall file a joint case management statement by October 6, 2006.

4 Dated: July 12, 2006



5 United States District Judge

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STIPULATED REQUEST FOR ORDER GRANTING RELIEF FROM CASE
MANAGEMENT SCHEDULE